

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
RICHARD HORACE COLE, JR. : **CASE NO. 1:22-bk-01049-HWV**
SHARI W. COLE :
 Debtors :
 : **CHAPTER 13**
SANTANDER CONSUMER USA INC. :
dba CHRYSLER CAPITAL :
 Movant :
 :
 :
v. :
 :
RICHARD HORACE COLE, JR. :
SHARI W. COLE :
 Respondents :

DEBTORS' RESPONSE TO MOTION OF
SANTANDER CONSUMER USA INC, dba CHRYSLER CAPITAL
FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, come Debtors, Richard Horace Cole, Jr. and Shari W. Cole, by and through their attorney, Gary J. Imblum, and respectfully respond as follows:

1. Admitted.
2. Admitted.
3. Admitted in part and denied in part. The Contract and Lien and Title information speak for themselves. Strict proof is demanded.
4.
 - A. Admitted.
 - B. Admitted in part and denied in part. The Contract speaks for itself. Strict proof is demanded.
 - C. Admitted in part and denied in part. Debtors have no knowledge. Strict proof is demanded as to the Clean Retain Value of the vehicle.
 - D. Admitted in part and denied in part. It is admitted that the vehicle is being

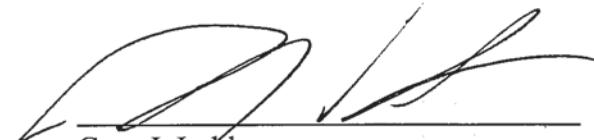
paid through the Plan and, further, the arrearage to the Trustee is admitted.

Debtors will make an offer to bring the Trustee current in the near future.

5. A. Admitted in part and denied in part. Debtors will make an offer to bring the payments current with the Trustee. That will result in the Movant being adequately protected.

WHEREFORE, Debtors respectfully request that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



Gary J. Imblum
Attorney I.D. No. 42606
4615 Derry Street
Harrisburg, PA 17111
(717) 238-5250
Fax No. (717) 558-8990
gary.imblum@imblumlaw.com
Attorney for Debtors

DATED: 6/23/23

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTORS' RESPONSE TO MOTION OF SANTANDER CONSUMER USA INC., dba CHRYSLER CAPITAL FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

JACK N. ZAHAROPOULOS, ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

WILLIAM E. CRAIG, ESQUIRE
MORTON & CRAIG LLC
COUNSEL FOR MOVANT
VIA E-SERVICE

IMBLUM LAW OFFICE, P.C.

Carol V. Shay

Carol V. Shay, Paralegal
4615 Derry Street
Harrisburg, PA 17111
(717) 238-5250
Fax No. (717) 558-8990
gary.imblum@imblumlaw.com
For Debtors

DATED: 6/23/2023